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11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN JOSE DIVISION**
15

16 *In re Google Generative AI Copyright*
17 *Litigation*

Master File Case No.: 5:23-cv-03440-EKL
Consolidated with Case No.: 5:24-cv-02531-EKL

18 **DECLARATION OF QIFAN HUANG IN**
19 **SUPPORT OF DEFENDANTS' REQUEST**
20 **FOR JUDICIAL NOTICE AND**
21 **CONSIDERATION OF MATERIALS**
22 **INCORPORATED BY REFERENCE**

Judge: Hon. Eumi K. Lee

1 I, Qifan Huang, declare as follows:

2 1. I am an attorney duly licensed to practice before this Court. I am an Associate at
3 the law firm of Wilson Sonsini Goodrich & Rosati, P.C., counsel for Defendants Google LLC
4 and Alphabet Inc. in this matter. I have personal knowledge of the facts set forth herein and, if
5 called as a witness, I could and would testify competently thereto.

6 2. Attached as **Exhibit 1** is a certified copy of the Certificate of Registration for U.S.
7 Copyright No. TX 9-082-399, titled “Adulthood is a Myth: A ‘Sarah’s Scribbles’ 2021 Wall
8 Calendar.” The U.S. Copyright Office mailed this copy of the Certificate to me in response to my
9 written request for the Certificate of Registration for this copyright. Under the caption
10 “Limitation of copyright claim,” the Certificate of Registration states that “[m]aterial excluded
11 from this claim” includes “previously published art with accompanying text.”

12 3. Attached as **Exhibit 2** is a certified copy of the Certificate of Registration for U.S.
13 Copyright No. TX 8-207-926, titled “Adulthood Is a Myth: A Sarah’s Scribbles Collection.” The
14 U.S. Copyright Office mailed this copy of the Certificate to me in response to my written request
15 for the Certificate of Registration for this copyright. Under the caption “Limitation of copyright
16 claim,” the Certificate of Registration states that “[m]aterial excluded from this claim” includes
17 “[s]ome cartoons previously appeared on author’s website.”

18 4. Attached as **Exhibit 3** is a certified copy of the Certificate of Registration for U.S.
19 Copyright No. TX 8-564-573, titled “Herding Cats: A Sarah’s Scribbles Collection.” The U.S.
20 Copyright Office mailed this copy of the Certificate to me in response to my written request for
21 the Certificate of Registration for this copyright. Under the caption “Limitation of copyright
22 claim,” the Certificate of Registration states that “[m]aterial excluded from this claim” includes
23 “[s]ome cartoons previously published online.”

24 5. Attached as **Exhibit 4** is a true and correct copy of the social media post at
25 <https://x.com/SarahCAndersen/status/679691764836515844>, that I retrieved on January 16,
26 2025. The post reflects that it was made by the user Sarah Andersen, @SarahCAndersen, a
27 verified account described as “Author of Sarah’s Scribbles, FANGS, and Cryptid Club.”
28 (<https://x.com/SarahCAndersen>.) The post is dated December 23, 2015. That is before December

12, 2016—the date of publication as shown on the corresponding copyright registration. See ECF Nos. 92-1 at 10; 92-2 at 4.

6. Attached as **Exhibit 5** is a true and correct copy of the social media post at <https://x.com/SarahCAndersen/status/694905848053809153>, that I retrieved on January 16, 2025. The post reflects that it was made by the user Sarah Andersen, @SarahCAndersen, a verified account described as “Author of Sarah’s Scribbles, FANGS, and Cryptid Club.” The post is dated February 3, 2016. That is before December 12, 2016—the date of publication as shown on the corresponding copyright registration. See ECF Nos. 92-1 at 10; 92-2 at 5.

7. Attached as **Exhibit 6** is a true and correct copy of the social media post at <https://x.com/SarahCAndersen/status/1320010279103627265>, that I retrieved on January 16, 2025. The post reflects that it was made by the user Sarah Andersen, @SarahCAndersen, a verified account described as “Author of Sarah’s Scribbles, FANGS, and Cryptid Club.” The post is dated October 24, 2020. That is before December 7, 2021—the date of publication as shown on the corresponding copyright registration. See ECF Nos. 92-1 at 12; 92-2 at 7.

8. Attached as **Exhibit 7** is a true and correct copy of the Alphabet Form 10-K, dated January 30, 2024, at https://www.sec.gov/Archives/edgar/data/1652044/000165204424000022/goog-20231231.htm#i4b6997819c884b839f301ffc0d7fb828_307, that I retrieved on January 16, 2025. The document was cited in the Consolidated Amended Complaint. See ECF No. 92 at ¶ 107 n.13.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 17, 2025.

/s/ Qifan Huang
Qifan Huang
qhuang@wsgr.com

SIGNATURE ATTESTATION

I, Maura L. Rees, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ Maura L. Rees
Maura L. Rees